1 The Honorable Ricardo S. Martinez 2 3 4 UNITED STATES DISTRICT COURT 5 WESTERN DISTRICT OF WASHINGTON 6 AT SEATTLE 7 8 TREVOR KEVIN BAYLIS, Case No. 2:23-cv-01653-RSM 9 Plaintiff, (pro se). **DECLARATION OF BAYLIS** IN SUPPORT OF PLAINTIFF'S 10 MOTION TO STRIKE DEFENDANT v. **VALVE CORPORATION'S** AFFIRMATIVE DEFENSES 11 VALVE CORPORATION, 12 Defendant. 13 14 I, Trevor Kevin Baylis, declare as follows: 15 I am a professional 3D artist and animator. I represent myself as Plaintiff 1. 16 ("Baylis") in this matter. I am fifty six years old and have personal knowledge of the facts 17 stated below. I am otherwise competent to testify and, if called upon to testify on the matters 18 herein, would do so consistently with this declaration. 2. Attached hereto as Exhibit A is a true and correct copy of 2024-03-19 20 07 Valve Response to 1st RFAs #Dkt. 27. Wherein Valve respond with insufficient 21 "boilerplate answers." 22 23 DECLARATION OF BAYLIS IN SUPPORT OF PLAINTIFF'S MOTION 24 TO STRIKE DEFENDANT VALVE CORPORATION'S AFFIRMATIVE **DEFENSES** No. 2:23-cv-01653-RSM

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3. Attached hereto as **Exhibit B** is a true and correct copy of 2024-03-14 Valve Response to 2nd RFAs #Dkt. 28. Wherein Valve respond with insufficient "boilerplate answers."

- 4. Attached hereto as **Exhibit C** is a true and correct copy of 2024-04-08 Valve Response to 3rd RFAs #Dkt. 31. Wherein Valve respond with insufficient "boilerplate answers."
- 5. Attached hereto as **Exhibit D** is a true and correct copy of email exchanges Baylis had with Jonah O. Harrison (and others) attorney at the law firm Arete Law Group PLLC. Who represent Defendant Valve Corporation ("Valve") in this matter. Wherein, Baylis makes available contact details for Lawyer Max Tuominen who has the Iron Sky Chain of Title documentation after the bankruptcy of Iron Sky Producers, and also contact information for principle Iron Sky Producer Tero Kaukomaa of Blind Spot Pictures who were headquartered in Switzerland. (Baylis\_4 and Baylis\_5)

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed in Tampere, Finland on this 16th day of April, 2024.

Trevor K Baylis

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DECLARATION OF BAYLIS IN SUPPORT OF PLAINTIFF'S MOTION TO STRIKE DEFENDANT VALVE CORPORATION'S AFFIRMATIVE DEFENSES

No. 2:23-cv-01653-RSM

1 2 CERTIFICATE OF SERVICE FORM 3 FOR ELECTRONIC FILINGS 4 I hereby certify that on 16th April 2024 I electronically filed the foregoing document 5 with the United States District Court 6 Western District of Washington at Seattle by using the 7 CM/ECF system. I certify that the following parties or their counsel of 8 record are registered as ECF Filers and that they will be served by the 9 CM/ECF system: 10 Jeremy E Roller: jroller@aretelaw.com, 11 jfischer@aretelaw.com, 12 kgreenberg@aretelaw.com 13 14 Jonah O. Harrison: jharrison@aretelaw.com, 15 jfischer@aretelaw.com, 16 kgreenberg@aretelaw.com 17 18 Dated: 16th April 2024 19 Trun Bayli 20 21 Trevor Kevin Baylis 22 Jankanraitti 23 Tampere 33560, FINLAND DECLARATION OF BAYLIS IN SUPPORT OF PLAINTIFF'S MOTION 24 TO STRIKE DEFENDANT VALVE CORPORATION'S AFFIRMATIVE **DEFENSES** No. 2:23-cv-01653-RSM